

1 TORRANCE CITY ATTORNEY'S OFFICE  
John L. Fellows III (State Bar No. 103968)  
2 City Attorney  
jfellows@TorranceCA.gov  
3 Della Thompson-Bell (State Bar No. 224846)  
Deputy City Attorney  
4 dthompsonbell@TorranceCA.Gov  
3031 Torrance Boulevard  
5 Torrance, CA 90503  
Telephone: 310-618-5810  
6 Facsimile: 310-618-5813

7 RUTAN & TUCKER, LLP  
Robert S. Bower (State Bar No. 70234)  
8 rbower@rutan.com  
Ajit S. Thind (State Bar No. 268018)  
9 athind@rutan.com  
611 Anton Boulevard, Fourteenth Floor  
10 Costa Mesa, California 92626-1931  
Telephone: 714-641-5100  
11 Facsimile: 714-546-9035

12 Attorneys for Defendant  
TORRANCE POLICE DEPARTMENT

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14 UNITED STATES DISTRICT COURT

15 CENTRAL DISTRICT OF CALIFORNIA

16 ROBERT THOMSON,

17 Plaintiff,

18  
19 vs.

20 TORRANCE POLICE DEPARTMENT  
21 and THE LOS ANGELES COUNTY  
22 SHERIFFS DEPARTMENT,

23 Defendants.  
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Case No. CV11-06154 SJO (JCx)  
Date Action Filed: July 26, 2011

Assigned to:  
U.S. District Judge S. James Otero

**DECLARATION OF AJIT SINGH  
THIND IN SUPPORT OF  
DEFENDANT TORRANCE POLICE  
DEPARTMENT'S MOTION  
OPPOSITION TO PLAINTIFF'S  
MOTION FOR SUMMARY  
JUDGMENT**

[Filed Concurrently With TPD's  
Memorandum of Points and Authorities in  
Opposition to Plaintiff's Motion for  
Summary Judgment and TPD's Statement  
of Genuine Disputes of Material Facts]

Motion Hearing Date: Feb. 27, 2012  
Time: 10:00 a.m.  
Courtroom: 1- 2nd Floor  
Location: Spring Street

**DECLARATION OF AJIT SINGH THIND**

I, Ajit Singh Thind, declare as follows:

1. I have personal knowledge of the matters set forth in this declaration and, if called, could and would testify competently to such matters.

2. I am an attorney in the law firm Rutan & Tucker, LLP, counsel of record for Defendant TORRANCE POLICE DEPARTMENT ("TPD").


3. I make this declaration in support of TPD's Memorandum of Points and Authorities in Opposition to Plaintiff Robert Thomson's Motion for Summary Judgment.

4. On cross-motions for summary judgment in the related case of *Birdt v. Beck*, 2:10-CV-08377-JAK-JEM, Judge Kronstadt of the Central District Court found for the Los Angeles County Sheriff's Department ("LASD"), the Los Angeles Police Department ("LAPD"), Charlie Beck, and Lee Baca against Jonathan Birdt (Plaintiff's attorney in this very litigation). The order found that LASD and LAPD's CCW policies did not violate the Second Amendment. A true and correct copy of the Court's order is attached as Exhibit "A" to this declaration.

5. A true and correct copy of the Declaration of Professor John Zimring and his curriculum vitae, previously filed by LASD in this very litigation, is attached as Exhibit "B" to this declaration.

Executed on this 3 day of February, 2012, at Costa Mesa, California.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

  
Ajit Singh Thind